

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	Criminal Action No. 07-48-GMS
)	
TYRONE ROANE,)	
)	
Defendant.)	

GOVERNMENT'S VOIR DIRE REQUEST

The Government submits the following request for special voir dire:

1. Do you know (witness list to be applied)?
2. Government alleges three charges against the defendant. The Government alleges one count of Possession with intent to distribute more than five grams of a mixture containing a detectable amount of cocaine base or "crack." The Government also alleges that the defendant was in possession of a firearm by a previously convicted felon. Finally, the government alleges that the defendant possessed a firearm in furtherance of a drug trafficking crime, namely Possession with intent to deliver in excess of five grams of cocaine base or "crack." Is there anything about the nature of these charges that would prevent you from being an impartial juror?
3. Do you object to a law which prohibits people convicted of certain crimes from possessing a firearm or ammunition, even after they have completed their sentence?
4. Are you a member of any organization which supports or opposes federal or state gun control laws?

5. Do you think the police should spend less time investigating gun and firearms cases than they do?
6. Have you, your spouse, a relative or close friend, ever been the victim of gun violence or a crime that involved the use of a firearm?
7. Have you, your spouse, a relative or close friend ever been charged with a crime involving the possession or use of a firearm?
8. Do you object to laws which prohibits the use, sale, distribution, or possession of illegal drugs?
9. Are you a member of any organization which supports the legalization of drugs or narcotics?
10. Have you, your spouse, a relative or close family member been addicted to any drug or narcotic?
11. Have you, your spouse, a relative or close friend been charged with a crime relating to the possession, use, sale, or distribution of illegal drugs?
12. Would the fact that the ATF and the Wilmington Police Department are the investigating and/or participating agencies in this case interfere with your ability to be fair and impartial?
13. Have you served on a jury for a criminal case before?
14. Have you been arrested for anything (other than a minor traffic offense)?

15. Have you ever testified in a criminal case?

Respectfully submitted,

COLM F. CONNOLLY
United States Attorney

By: 

Shawn E. Martyniak
Special Assistant United States Attorney
1007 Orange Street, Suite 700
Wilmington, DE 19899-2046
(302) 573-6277